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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 05-00395 CRB
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	SUPPLEMENTAL PROTECTIVE ORDER
v.)	REGARDING DISCOVERY AS TO
)	DEFENDANT WU SANG NAH
YOUNG JOON YANG, aka Yang,)	
WU SANG NAH, aka Kang)	
SUNG YONG KIM, aka Nam, aka Mr. Kim,)	
HANG JOE YOON, aka Mr. Lee,)	
MYONG SU AHN, aka Paula Lee,)	
NAM YOUNG LEE,)	
FRED A. FRAZIER,)	
TRONG DU NGUYEN, aka John)	
AHDI M. NASHASHIBI,)	
YOUNG JOO LEE,)	
MIN YOUNG BANG,)	
IN SEUNG KIM,)	
SEYUN KIM,)	
EUGENE YI,)	
CHANG SOO YOUN,)	
MO SOOK YANG,)	
KEUN SUNG LEE, aka Kenneth,)	
MYUNG JIN CHANG,)	
WON SEOK YOO,)	
JIMMY GONG YAN LEE,)	
AESUN KIM, aka Mami,)	

1 HYEON J. PARK,
 ANTHONY GAR LAU,
 2 MI YOUNG SIM, aka Jackie,
 KUM PAE YI,
 3 HAN LEE,
 HYE CHA KIM, aka Kelly,
 4 JIN AH KANG,
 YON SUK PANG, aka Nana,
 5
 Defendants.
 6

7
 8 The United States, through its counsel of record, and the defendants, through their
 9 counsel of record, hereby agree and stipulate that the government will provide discovery on the
 10 following conditions:

11 1. Protected Material

12 The discovery produced in this matter is deemed Protected Material. Possession of
 13 copies of the Protected Material is limited to the defendants, their attorneys of record, and
 14 investigators, paralegals, law clerks, translators, interpreters, experts and assistants for the
 15 attorneys of record (hereinafter collectively referred to as "members of the defense team").

16 The defendants, their attorneys of record, and members of the defense team acknowledge
 17 that providing copies of the Protected Material to other persons is prohibited, and agree not to
 18 duplicate or provide copies of the Protected Material to other persons. The defendants, their
 19 attorneys of record, and members of the defense team may show Protected Material to witnesses
 20 or prospective witnesses in conjunction with their defense of the defendants in this case. The
 21 defendants, their attorneys of record, and members of the defense team further acknowledge that
 22 they are prohibited from using the Protected Material for any purpose other than defending the
 23 defendant in the above-captioned matter. Any violation of these prohibitions constitutes a
 24 violation of the Protective Order. Further, the attorneys of record agree that prior to
 25 disseminating any copies of the Protected Material to members of the defense team, they will
 26 provide a copy of this Protective Order to members of the defense team.

27 Notwithstanding efforts taken by the government to redact personal information of

witnesses from the discovery provided to the defense (such as date of birth, social security numbers, addresses, phone numbers, etc.), defense counsel, the defendants and members of the defense team agree that, should any such information be found during their review of this material, they will not provide that personal information in any form – whether in verbal, written or electronic format – to any third party, for any reason whatsoever.

2 Nontermination

The provisions of this Order shall not terminate at the conclusion of this prosecution but only upon further order of this Court. Within 30 days of a verdict or guilty plea, the defendants' attorneys of record shall return all copies of any Protected Material (including all copies provided to the defendants, their attorneys of record, and members of the defense team) to the United States Attorney's Office for the Northern District of California.

SO STIPULATED.

DATED: September 13, 2005

/s/ Monica Fernandez
PETER B. AXELROD
MONICA FERNANDEZ
Assistant United States Attorneys

ANDREW KLINE
J. EVANS RICE III
Trial Attorneys, U.S. Department of Justice

DATED: September 12, 2005

/s/ James Bustamante
JAMES BUSTAMANTE
Counsel for Defendant Wuh Sang NAH

ORDER

IT IS SO ORDERED.

DATED: September 14, 2005

~~CHARLES R. BREYER~~
~~United States District Judge~~
ELIZABETH D. LAPORTE
United States Magistrate Judge

